

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

DAVID HENEGAR,

Plaintiff,

v.

GEORGIA CORRECTIONAL
HEALTH, LLC, AUGUSTA
UNIVERSITY, AUGUSTA
UNIVERSITY HEALTH, AUGUSTA
UNIVERSITY MEDICAL CENTER,
INC., BILL NICHOLS, SHARON
LEWIS, CINDY MCDADE,
CHARLES BURKE, SHERIE L. LEE,
NURSE MELTON, UNKNOWN
MEDICAL PROVIDERS, WARDEN
PAMELA BALLINGER,
LIEUTENANT STROH, SERGEANT
KEITH, UNKNOWN
CORRECTIONAL OFFICERS,
CORNERSTONE MEDICAL
CENTER, CHI MEMORIAL, JOHN
OWENSBY, CARRIE PRITCHETT,
MEGAN ARTHUR, and the STATE
OF GEORGIA,

Defendants.

CIVIL ACTION NO.
4:18-cv-00192-HLM

JURY TRIAL DEMANDED

**CONSENT MOTION TO EXTEND TIME FOR FILING RESPONSE TO
MOTION TO DISMISS FILED BY DEFENDANTS STATE OF GEORGIA,
GEORGIA CORRECTIONAL HEALTHCARE, AUGUSTA UNIVERSITY,
AUGUSTA UNIVERSITY HEALTH, AUGUSTA UNIVERSITY MEDICAL
CENTER, NICHOLS, LEWIS, MCDADE, BURKE, LEE, MELTON,
BALLINGER, STROH, AND KEITH AND BRIEF IN SUPPORT THEREOF**

Plaintiff David Henegar, by his attorneys, respectfully requests that this Court grant him an extension of time to respond to the Motion to Dismiss filed by Defendants State of Georgia, Georgia Correctional Healthcare, Augusta University, Augusta University Health, Augusta University Medical Center, Nichols, Lewis, McDade, Burke, Lee, Melton, Ballinger, Stroh, and Keith. (ECF No. 45). In support of this motion, Plaintiff states as follows:

1. Plaintiff filed this lawsuit under 42 U.S.C. § 1983 and Georgia state law.
2. The above-named Defendants filed a Motion to Dismiss on October 19, 2018. Plaintiff's response is due on November 1, 2018.
3. Plaintiff's consolidated response to the other Defendants' Motions to Dismiss is due on November 6, 2018.
4. Plaintiff believes it will be most efficient to submit all of his responses together.
5. Plaintiff respectfully requests and extension of time to respond to the Motion to Dismiss filed by the above-named Defendants until November 6, 2018.

6. Plaintiff requests this extension in good faith and asserts that it will not delay the proceedings or prejudice any party.

7. The above-named Defendants do not oppose this motion.

WHEREFORE, Plaintiff requests that this Court grant him an extension to file his response to the Motion to Dismiss filed by Defendants State of Georgia, Georgia Correctional Healthcare, Augusta University, Augusta University Health, Augusta University Medical Center, Nichols, Lewis, McDade, Burke, Lee, Melton, Ballinger, Stroh, and Keith until November 6, 2018. A proposed order is attached hereto.

Respectfully submitted,

/s/ Rachel Brady
Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I, Rachel Brady, an attorney, certify that on November 1, 2018, I filed the foregoing motion using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ Rachel Brady
Attorney for Plaintiff